

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

In re:) Case No. 21-61491
)
SQUIRRELS RESEARCH LABS, LLC, <i>et</i>) Chapter 11
<i>al.</i> ,)
) Jointly Administered
Debtors.)
) Judge Russ Kendig
)
)

**NOTICE OF
MOTION FOR RELIEF FROM THE SALE ORDER FOR THE LIMITED PURPOSE
OF AMENDING THE DISTRIBUTION SCHEME PENDING DISCOVERY**

Creditor Carl Forsell has filed papers with this Court, a *Motion For Relief From The Sale Order For The Limited Purpose Of Amending The Distribution Scheme Pending Discovery* (Doc. No. 166).

Pursuant to Local Rule 9013-1(b), if you do not want the court to grant the motion, or if you want the court to consider your views on the motion, then on or before **March 8, 2022**, you or your attorney must file with the court a written response explaining your position at:

United States Bankruptcy Court
Office of the Clerk
Ralph Regula Federal Building and U.S. Courthouse
401 McKinley Avenue, SW
Canton, Ohio 44702

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also send a copy to the undersigned counsel:

Bryan J. Sisto (OH 0088143)
FROST BROWN TODD LLC

400 W. Market Street, Suite 3200
Louisville, KY 40202
Phone: (502) 589-5400
Email: bsisto@fbtlaw.com

A non-evidentiary hearing on the matter will be held telephonically on **March 15, 2022 at 2:00 pm**. If the hearing proceeds, counsel and parties should call (888) 684-8852 and use Access Code 3303949 followed by the pound sign, which is #. Upon connection you will automatically be muted. (That is, you will be able to hear, but you will not be heard.) The courtroom deputy will call court into session and call each case. When your case is called, you may unmute your line by pressing * and then pressing 6 on your telephone keypad. If you have a problem connecting to the hearing, immediately contact chambers at 330-458-2440. The hearing may be adjourned by the court from time to time without further notice.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief, without further notice or hearing.

Dated: February 22, 2022

Respectfully submitted,

/s/ Bryan J. Sisto

Bryan J. Sisto (OH 0088143)

FROST BROWN TODD LLC

400 W. Market Street, Suite 3200

Louisville, KY 40202

Phone: (502) 589-5400

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Counsel for Carl Forsell

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served upon the following on February 22, 2022, via the Court's electronic mail notice list:

- **John C. Cannizzaro** John.Cannizzaro@icemiller.com,
lauren.prohaska@icemiller.com
- **Christopher Paul Combest** christopher.combest@quarles.com
- **John G. Farnan** jfarnan@westonhurd.com
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- **Paul J. Schumacher** pschumacher@dmclaw.com, tgross@dmclaw.com
- **Frederic P. Schwieg** fschwieg@schwieglaw.com
- **Frederic P. Schwieg** fschwieg@schwieglaw.com
- **United States Trustee** (Registered address)@usdoj.gov
- **Joshua Ryan Vaughan** jvaughan@amer-collect.com,

SAllman@AMER-COLLECT.COM; HouliECF@aol.com

• **Julie K. Zurn** jzurn@brouse.com, tpalcic@brouse.com

• **Kate M. Bradley** kate.m.bradley@usdoj.gov

Via regular U.S. Mail:

Brouse McDowell

388 South Main Street
Suite 500
Akron, OH 44311-4407

Jason R. Schendel

Sheppard, Mullin, Richter & Hampton LLP
Four Embarcadero Center
Seventeenth Floor
San Francisco, CA 94111

Dated: February 22, 2022

Respectfully submitted,

/s/ Bryan J. Sisto

Bryan J. Sisto (OH 0088143)

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